MacGill

Patrick Sanders <patrick.sanders@macgilllaw.com>

Hunt v. Southern Baptist Convention, et al. - client using pseudonym

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Robert MacGill <robert.macgill@macgilllaw.com>   Tue, Apr 9, 2024 at 1:0
To: "Melissa J. Hogan" <melissajhogan@qavahlaw.com>
Cc: Basyle Tchividjian <boz@bozlawpa.com>, Patrick Sanders <patrick.sanders@macgilllaw.com>, Scott Murray <Scott.Murray@macgilllaw.com>

Melissa,

We have a number of open issues to discuss. We made a proposal on Friday and you have not responded. We must meet and confer as required before motion practice is authorized.

We propose a privacy stipulation to document and address your concerns as to your clients' name and related issues, a conference on our counter-proposals and a meaningful effort at resolution.

Please confirm a call at 4:30 today.

Best regards.

Robert D. MacGill
MacGill PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46260
317.442.3825
Robert.MacGill@MacGillLaw.com

P Please consider the environment before printing this email.

On Tue, Apr 9, 2024 at 12:39 PM Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:
> I don't think we need a call for this. I saw your motion to seal filed today, but again, our position is that given that our client's name and identifying information was redacted at every point pri
> to us notifying you that we were proceeding with motions to use a pseudonym and a protective order, and then within days, you file her name openly multiple times, this is outrageous.
>
> I will ask you a third and final time before I file, do you oppose our motion to proceed under a pseudonym and require redaction of my client's name and identifying information?
>
> Melissa
>
>> On Apr 9, 2024, at 10:34 AM, Patrick Sanders <patrick.sanders@macgilllaw.com> wrote:
>>
>>
>> Melissa,
>>
>> Are you available for a call at 4:30pm ET today to discuss?
>>
>> Thank you,
>>
>> **Patrick Sanders**
>> Associate
>> MacGill PC
>> Patrick.Sanders@MacGillLaw.com
>> w: 317-961-5390
>> m: 317-670-1557
>> www.MacGillLaw.com
>>
>> On Tue, Apr 9, 2024 at 11:11 AM Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:
>>> Today I plan to ask the court to expedite all of my client's motions related to the deposition (use pseudonym, redaction, protective order) given that it's noticed for 4/16, only a
>>> week away. Does anyone oppose?
>>>
>>> Melissa
>>>
>>>> On Apr 8, 2024, at 2:30 PM, Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:
>>>>
>>>> Robert,
>>>> Per your letter, I can confirm that Boz represents a party in a case scheduled to commence trial in New York State on April 15, 2024. Please confirm that means
>>>> you are in agreement to May 21 if the court so consents. Again, other parties were also free May 7, 8, or May 22 as well.
>>>>
>>>> Please confirm on this issue and the item below.
>>>>
>>>> Regards,
>>>> Melissa
>>>>
>>>> **Melissa J. Hogan, Esq.**
>>>> **QAVAH LAW**
>>>> melissajhogan@qavahlaw.com
>>>> 615.293.6623
>>>>
>>>>> On Apr 8, 2024, at 10:42 AM, Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:
>>>>>
>>>>> Robert,
>>>>> Your letter did not address this issue and therefore I wanted to check in again and confirm whether or not you were opposing our motion for our
>>>>> client to proceed under a pseudonym and require redaction of her identifying information from any filings. I would appreciate your response by 5pm
>>>>> ET today.

Regards,
Melissa

Melissa J. Hogan, Esq.
QAVAH LAW
melissajhogan@qavahlaw.com
615.293.6623

On Apr 5, 2024, at 7:46 AM, Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:

Robert,
My email already described the issue but I'll elucidate it further in the motion if I need to. We're all aware of the facts of this case. Will you be opposing the motion?

Regards,
Melissa

Melissa J. Hogan, Esq.
QAVAH LAW
melissajhogan@qavahlaw.com
615.293.6623

On Apr 5, 2024, at 4:52 AM, Robert MacGill <robert.macgill@macgilllaw.com> wrote:

Melissa,

Can you explain the basis for your claim?

Are you claiming a right of privacy on behalf of your client and/or that disclosure would be an invasion of privacy?

Please provide more details legally and factually for your claim. I am hoping that once you provide more information on the basis for your claim that we can come to an agreement that is appropriate.

Best regards.

Robert D. MacGill
MacGill PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46260
317.442.3825
Robert.MacGill@MacGillLaw.com

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On Thu, Apr 4, 2024 at 1:49 PM Scott Klein <Klein@mintzandgold.com> wrote:

Melissa,

Guidepost does not object.

<image001.png> Scott Klein

600 Third Avenue, 25th Fl., New York, NY 10016

D 646.792.0333 | **O** 212.696.4848 | **C** 917.886.2204

<image002.png>

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From: Melissa J. Hogan <melissajhogan@qavahlaw.com>
Sent: Thursday, April 4, 2024 12:07 PM
To: Scott Klein <Klein@mintzandgold.com>
Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Allison Carter <acarter@rjfirm.com>; Adam Brody <brody@mintzandgold.com>; Alex Otchy <otchy@mintzandgold.com>; Basyle Tchividjian <boz@bozlawpa.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; John Jacobson <JJacobson@rjfirm.com>; Kathy Klein <KKlein@rjfirm.com>; Steve Mintz <Mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) <thurney@jacksonkelly.com>; agoldstein@colelawgrouppc.com; bbundren@bradley.com; gbesen@bradley.com; gmarchetti@tpmblaw.com; matt@tpmblaw.com; patrick.sanders@macgilllaw.com; scott.murray@macgilllaw.com; snokes@bradley.com; tcole@colelawgrouppc.com; tpresnell@bradley.com
Subject: Hunt v. Southern Baptist Convention, et al. - client using pseudonym

Although this wasn't specifically mentioned in our meet and confers, I believe it was understood, but I wanted to cover it to be clear. Our client intends to move to proceed under a pseudonym and seal the subpoena/notice and redact identifying information, as a non-party to this action regarding sensitive personal events. I don't believe this prejudices any party as everyone here is aware of her identity. Please confirm whether or not you have an objection to same.

Melissa

Melissa J. Hogan, Esq.
QAVAH LAW
melissajhogan@qavahlaw.com
615.293.6623